### **FILED**

January 17, 2024

### UNITED STATES DISTRICT COURT WESTERN DISTRICT OF TEXAS EL PASO DIVISION

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS

By: DT

Deputy

UNITED STATES OF AMERICA,	§	, ,
Plaintiff,	§ §	<b>INDICTMENT</b> Case No: EP:24-CR-00161-FM
v.	<b>§</b>	CT. 1: 18 U.S.C. § 1201(a)(1) – Kidnapping
BRAYDEN MATTHEW ALVARADO,	§ §	Resulting in Death
Defendant.	§ §	CT. 2: 18 U.S.C. § 2119(3) – Carjacking Resulting in Death
	§ §	Notice of Government's Demand for
	§ §	Forfeiture

THE GRAND JURY CHARGES THAT:

## COUNT ONE (Kidnapping Resulting in Death) (18 U.S.C. § 1201(a)(1))

Beginning on or about December 3, 2023, and continuing through on or about December 4, 2023, in the Western District of Texas, the District of New Mexico, and elsewhere, the Defendant.

#### BRAYDEN MATTHEW ALVARADO,

did unlawfully and willfully, seize, confine, kidnap, abduct, carry away, and hold for ransom, reward, and otherwise, Victim 1, resulting in the death of Victim 1, and, in committing and in furtherance of the commission of the offense, willfully travelled and transported Victim 1 in interstate commerce, in violation of 18 U.S.C. § 1201(a)(1).

# COUNT TWO (Carjacking Resulting in Death) (18 U.S.C. § 2119(3))

Beginning on or about December 3, 2023, and continuing through on or about December 4, 2023, in the Western District of Texas, the District of New Mexico, and elsewhere, the Defendant,

#### BRAYDEN MATTHEW ALVARADO,

with the intent to cause death and serious bodily harm, took and attempted to take a motor vehicle, to wit, a 2018 GMC Yukon, that had been transported, shipped, and received in interstate and foreign commerce from Victim 1 by force, violence, and intimidation, resulting in Victim 1's death, in violation of Title 18, United States Code, Section 2119.

### NOTICE OF GOVERNMENT'S DEMAND FOR FORFEITURE [See Fed. R. Crim. P. 32.2]

I.

Car-Jacking Violations and Forfeiture Statutes

[Title 18 U.S.C. § 2119(3), subject to forfeiture pursuant to Title 18 U.S.C. § 924(d)(1), made applicable to criminal forfeiture by Title 28 U.S.C. § 2461(c)]

As a result of the criminal violation in Count 3, the United States of America gives notice to Defendant **BRAYDEN MATTHEW ALVARADO** of its intent to seek the forfeiture of the certain property upon conviction pursuant to FED. R. CRIM. P. 32.2 and Title 18 U.S.C. § 924(d)(1), made applicable by 28 U.S.C. § 2461(c), which state:

### Title 18 U.S.C. § 924. Penalties

\* \* \*

(d)(1) Any firearm or ammunition involved in or used in any knowing violation of subsection (a)(4), (a)(6), (f), (g), (h), (i), (j), or (k) of section 922, or knowing importation or bringing into the United States or any possession thereof any firearm or ammunition in violation of section 922(l), or knowing violation of section 924, shall be subject to seizure and forfeiture under the provisions of this chapter. . .

A TRUE BILL.

FOREPERSON OF THE GRAND JURY

JAIME ESPARZA UNITED STATES ATTORNEY

BY

Assistant U.S. Attorney